

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS, EASTERN DIVISION**

HERBERT ELDEAN,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 07 C 6582
)	
ROGER MITCHELL, LAURENCE)	Judge Andersen
LACAILLADE, ECHELON GROUP, INC., an)	
Illinois corporation, ECHELON INSURANCE)	
SERVICES, INC., an Illinois corporation, and)	Magistrate Judge Schenkier
ECHELON PROPERTY AND CASUALTY)	
INSURANCE COMPANY, INC., an Illinois)	
corporation,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT
PURSUANT TO F.R.C.P. 55(a)(2)

NOW COMES the Plaintiff, HERBERT ELDEAN, by and through his attorneys, and for his Motion for Default against Defendants, ROGER A. MITCHELL, LAURENCE L. LACAILLADE, ECHELON INSURANCE SERVICES, INC., pursuant to F.R.C.P. 55(a)(2), state as follows:

1. On November 20, 2007, the Plaintiff, HERBERT ELDEAN ("Plaintiff") filed his instant Complaint.
2. On December 6, 2007, Defendant, ECHELON INSURANCE SERVICES, INC., was served by personal service of Summons and a copy of the Complaint upon its President, Anthony E. Cascino. (See Affidavit of Process Server, attached hereto as Exhibit "A").
3. On December 13, 2007, Defendant, LAURENCE L. LACAILLADE, was personally served with Summons and a copy of the Complaint. (See Affidavit of Process

Server, attached hereto as Exhibit "B").

4. On December 17, 2007, Defendant, ROGER MITCHELL, was personally served with Summons and a copy of the Complaint. (See Affidavit of Process Server, attached hereto as Exhibit "C").

5. More than two months have passed and Defendants, ROGER A. MITCHELL, LAURENCE L. LACAILLADE, ECHELON INSURANCE SERVICES, INC. have failed to file an answer with the Clerk of this Honorable Court.

6. The Defendants, ROGER A. MITCHELL, LAURENCE L. LACAILLADE, ECHELON INSURANCE SERVICES, INC. are therefore in default pursuant to F.R.C.P. 55(a)(2).

WHEREFORE, the Plaintiff HERBERT ELDEAN prays that this Honorable Court enter a judgment in his favor as against the Defendants, ROGER A. MITCHELL, LAURENCE L. LACAILLADE, ECHELON INSURANCE SERVICES, INC., and set this matter over for prove up and for any other relief this Court deems just and fit.

Respectfully submitted,

HERBERT ELDEAN

By: /s/Elliot S. Wiczer

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